

1 Tina Wolfson, CSB No. 174806  
2 *twolfson@ahdootwolfson.com*  
3 Robert Ahdoot, CSB No. 172098  
4 *rahdoot@ahdootwolfson.com*  
5 Theodore W. Maya, CSB No. 223242  
6 *tmaya@ahdootwolfson.com*  
7 **AHDOOT & WOLFSON, PC**  
8 10728 Lindbrook Drive  
9 Los Angeles, California 90024  
10 Telephone: (310) 474-9111  
11 Facsimile: (310) 474-8585

12 *Attorneys for Plaintiffs and*  
13 *Proposed Class Counsel*

14  
15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**  
17 **SOUTHERN DIVISION**

18 PHILIP ALVAREZ, RANDALL  
19 BETTISON, MARC KELLEHER, and  
20 DARLENE VAUGH individually and  
21 on behalf of all others similarly situated,

22 Plaintiffs,

23 v.

24 SIRIUS XM RADIO INC.,

25 Defendant.

Case No. 2:18-cv-8605-JVS-SS

26 **DECLARATION OF PAUL**  
27 **WRIGHT IN SUPPORT OF**  
28 **MOTION FOR PRELIMINARY**  
**APPROVAL OF CLASS ACTION**  
**SETTLEMENT**

1 I, Paul Wright, declare as follows:

2 1. I submit this declaration in support of preliminary approval of the Class  
3 Action Settlement in the matter of *Alvarez v. Sirius XM Radio Inc.*, Case No. 2:18-cv-  
4 8605-JVS-SS (C.D. Cal.). The matters stated herein are true of my own knowledge or,  
5 where indicated, I am informed and believe that they are true. If called upon as a  
6 witness, I could and would competently testify as follows.

7 2. I am a competent adult over the age of eighteen years of age and a resident  
8 of California.

9 3. I have participated in this litigation throughout its pendency, including by  
10 discussing my experience with purchasing a lifetime subscription from Sirius XM,  
11 searching for and gathering any relevant documents, reviewing the complaints, being  
12 available for my attorneys throughout the litigation, staying updated about the  
13 litigation, and approving the terms of the proposed Settlement.

14 4. I have reviewed, understood, and fully agree to the terms and conditions  
15 of the proposed Settlement. I approve and support the Settlement because I believe  
16 that it is fair, reasonable, and in the best interests of the Class. I have no conflict with  
17 the Class and pursued this litigation so that I would help others who similarly  
18 purchased a lifetime subscription from Sirius XM.

19 5. The lifetime subscription I purchased from Sirius XM is associated with  
20 a Device that was activated to receive Sirius XM's satellite radio service prior to June  
21 5, 2020 and that continues to receive the Sirius XM satellite radio service.

22 6. My lifetime subscription is therefore an Active Lifetime Subscription.

23 7. I retained attorneys experienced in consumer class action litigation, and  
24 understood they would represent the best interests of the Class.

25 8. I request that this Court approve the Settlement Agreement because it is  
26 in the best interests of the Class.

1           9. I also request that I be awarded \$5,000 for my work on this case in  
2 securing relief for hundreds of thousands of consumers.

3  
4           I declare under penalty of perjury under the laws of the United States that the  
5 foregoing is true and correct. Executed this 5th day of June 2020 in Huntington Beach,  
6 California.

7  
8   
9 Paul Wright (Jun 6, 2020 14:09 PDT)

10 Paul Wright  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28